

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted September 29 - October 3, 1980, it appears that certain of your activities were not conducted in accordance with NRC requirements.

- A. Criterion XVII of Appendix B to 10 CFR 50 states in part that "Sufficient records shall be maintained to furnish evidence of activities affecting quality . . . The records shall . . . include . . . qualifications of personnel"

Contrary to the above, Brown and Root did not maintain sufficient records of Engineering and Management personnel assigned to the Support Design Group to furnish evidence of their qualifications to conduct design activities for safety related pipe supports.

Criterion V of Appendix B to 10 CFR 50 states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished" Deviations from these requirements are as follows:

- B. Section 2.5 of procedure STP-PM-006-C (Engineering Procedure for Personnel Training) states in part that, "Within ten workdays of an employees assignment to the Project, the PA (Project Administration) and cognizant DPE (Discipline Project Engineer) shall review the employee's experience and qualifications and shall determine the employee's need for project - related indoctrination and training. The PA and Cognizant DPE shall formulate the necessary program on the STP New Employee Indoctrination Training Checklist (Form 200.80) and shall prepare a procedures readiness list (Form 200.81). . . . (Form 200.80 shall be) in the employee's individual qualification/training record in the Project files maintained in the Engineering Document Content Center (EDCC)." Section 1.0 of STP Forms Manual A040GM010-A further requires that, "Form 200.81 . . . becomes a part of each employees orientation and training records"

Contrary to the above, thirteen (13) of seventeen (17) qualification and training record files examined for Brown and Root engineering and management personnel assigned to the Support Design Group for more than ten days:

1. Were not maintained in the Engineering Document Control Center.

2. Did not contain Form 200.80 which documents that the PA and cognizant DPE reviewed the employee's experience and qualifications and determined the employee's need for project-related indoctrination and training and that the necessary training program had been formulated defined for each such newly assigned employee.
 3. Did not contain Form 200.81 which defines and documents that a required reading list for STP Project-related procedures had been prepared for each such newly assigned employee.
- C. Section 2.1.7.2 of STP-DC-010 (Engineering Procedure for Codification) states in part that, ". . . drawings originated on STP are serialized for each activity designation . . . (and that) once a drawing is issued for construction (as Rev. 0), all future revisions or issued under the next consecutive (revision) number"

Contrary to the above:

1. Two (2) of ten (10) hanger design and fabrication drawings being originated on STP were not uniquely serialized by the Support Design Group activity.
 2. Pipe Fabrication isometric drawings issued for construction as Rev. 0 were revised by the Support Design Group activity to indicate the type and location of pipe supports and were issued as part of stress calculation packages without using the next consecutive revision number.
- D. Section 6.3.3 of Section 6.0 (Document Control) of the South Texas Project Quality Assurance Manual states in part that, "Revisions to a QA document shall be summarized on a cover sheet or a Revision Record Sheet . . . and the revised document pages shall then be transmitted to B&R personnel . . . superseded QA document pages shall either be destroyed or stamped void or superseded by the recipient."

Contrary to the above, superseded QA document (QA procedures) pages were not destroyed nor stamped void or superseded by the recipients. (See Details Section II.B.3.)